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October 19, 2017

**By e-mail**

Roberto A. Rivera-Soto  
Special Discovery Master  
Ballard Spahr LLP  
210 Lake Drive East, Suite 200  
Cherry Hill, NJ 08002-1163  
riverasotor@ballardspahr.com

**Re: Williams et al. v. BASF Catalysts LLC, No. 2:11-cv-1754 (D.N.J.)**

Dear Special Discovery Master Rivera-Soto:

Pursuant to Your Honor's October 16, 2017 Order, Defendant Cahill Gordon & Reindel LLP ("Cahill"), by its undersigned counsel, writes to address the characterization of one motion in the list of motions set forth by Your Honor.

As we indicated in the telephone conference earlier this week, category #4 on Your Honor's list of motions – Plaintiffs' March 1, 2017 letter concerning Rule 30(b)(6) depositions, ECF #247 – concerned only defendant BASF. In their March 1 letter, Plaintiffs asserted that "Defendant BASF [] has refused to produce for deposition a representative" under Rule 30(b)(6). Plaintiffs attached to their letter three Exhibits – the two Rule 30(b)(6) notices Plaintiffs served on BASF, and a letter from BASF to Plaintiffs objecting to the notices. Plaintiffs' April 28, 2017 reply letter was the same. ECF #302 ("letter of March 1, 2017 (ECF No. 247) concerning Fed. R. Civ. P. 30(b)(6) deposition notices to BASF . . ."). In neither letter did Plaintiffs cite or attach any deposition notices to Cahill or correspondence with Cahill. We believe that was intentional: the week before Plaintiffs' March 1 letter, Cahill and Plaintiffs had spoken about the Rule 30(b)(6) notices to Cahill, and Plaintiffs agreed to review Cahill's responses and objections (served March 2, 2017) and meet and confer after that review. See Ex. 1 hereto (Mar. 2, 2017 email between counsel). After reviewing Cahill's responses and objections, Plaintiffs did not pursue a Rule 30(b)(6) deposition of Cahill.

We appreciate Your Honor's assistance in this case.

WILLIAMS & CONNOLLY LLP

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October 19, 2017  
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Respectfully submitted,

/s/

David S. Blatt

cc All counsel of record

EXHIBIT 1

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**From:** Blatt, David  
**Sent:** Thursday, March 02, 2017 1:50 PM  
**To:** 'Michael Coren' <[MCoren@cprlaw.com](mailto:MCoren@cprlaw.com)>  
**Subject:** Williams v. BASF

Mike – as we discussed last week, once you’ve had a chance to read these and confer with your colleagues, let’s you and I get back in touch to discuss. Thanks, David

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**From:** Blatt, David  
**Sent:** Thursday, March 02, 2017 1:47 PM  
**To:** Chris Placitella <[cplacitella@cprlaw.com](mailto:cplacitella@cprlaw.com)>; 'Michael Coren' <[MCoren@cprlaw.com](mailto:MCoren@cprlaw.com)>; Pollock, Jeffrey M. <[JMPollock@foxrothschild.com](mailto:JMPollock@foxrothschild.com)>; Jared Placitella <[jmplacitella@cprlaw.com](mailto:jmplacitella@cprlaw.com)>  
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**Subject:** Williams v. BASF

Chris – enclosed please find Cahill’s objections and responses to plaintiffs’ Rule 30(b)(6) Notices and the requests for production contained therein. Regards, David